

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Team Systems International, LLC,

Debtor(s).

Chapter 11

Case No. 22-10066-CTG

**CREDITORS' WITNESS LIST AND EXHIBIT LIST FOR HEARING**

Creditors, GPDEV, LLC AND SIMONS EXPLORATION, INC., ("**Creditors**"), by and through their undersigned counsel, hereby submit the enclosed witness and exhibit list for the hearing presently scheduled for January 24, 2022 at 3:00 p.m. (Eastern Time) for *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain its Bank Account and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management System as Necessary* (the "**Cash Management Motion**") [D.I. 4].

Dated: January 24, 2022

Respectfully submitted,

KASEN & KASEN, P.C.

/s/ Jenny R. Kasen

Jenny R. Kasen, Esquire (DE Bar No. 5849)

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-and-

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/s/ Michael H. Moody

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*Counsel to GPDEV, LLC and SIMONS  
EXPLORATION, INC.*

## Creditors' Witness List:

Name	Title	E-Mail Address	Location for Testimony	Summary of Subject Matter of Anticipated Testimony
George Peterson	Principal of GPDEV, LLC	<a href="mailto:GPeterson@projectdimensions.com">GPeterson@projectdimensions.com</a>	4 Park Plaza, Suite 700, Irvine, CA 92614	All matters relating to the Debtor's cash management motion and Creditors' discovery requests related thereto
Jordan Simons	Principal of Simons Exploration, Inc.	<a href="mailto:jordansimons77@gmail.com">jordansimons77@gmail.com</a>	542 N. Cherokee Ave, Los Angeles, CA 90004	All matters relating to the Debtor's cash management motion and Creditors' discovery requests related thereto

**Creditors' Exhibit List:**

<b>No.</b>	<b>Description</b>
1	Order Denying TSI's Motion for Stay Pending Appeal [Exhibit A to D.I. 12]
2	TSI Motion for Extension of Time to Comply with Court Orders [Exhibit B to D.I. 12]
3	Show Cause Order [Exhibit C to D.I. 12]
4	Post-Judgment Discovery Requests [Exhibit D to D.I. 12]
5	Trial Exhibit 20 A-1 - TSI's Receipt of \$37 Million [Exhibit E to D.I. 12]
6	PNC Bank Response to Writ of Garnishment [Exhibit F to D.I. 12]
7	Debtor's First Day Affidavit [D.I. 3]
8	Declaration of George Peterson re: Debtor's Cash Management Motion [D.I. 16]
9	Declaration of Jordan Simons re: Debtor's Cash Management Motion [D.I. 17]